

1 GEOFFREY A. NERI (SBN 258802)
gneri@millerbarondess.com
2 BENJAMIN TAYLOR (SBN 240636)
btaylor@millerbarondess.com
3 MILLER BARONDESS, LLP
1999 Avenue of the Stars, Suite 1000
4 Los Angeles, California 90067
Telephone: (310) 552-4400
5 Facsimile: (310) 552-8400

6 Attorneys for Defendant
UNIVERSAL FAMILY INSURANCE, LLC
7
8

9
10 **UNITED STATES DISTRICT COURT**
11
CENTRAL DISTRICT OF CALIFORNIA

12 NEW LIFE AGENCY, INC., a California
corporation

13 Plaintiff,

14 v.

15 ART RISK, FINANCIAL & INSURANCE
16 SOLUTIONS, INC., a Delaware corporation,
and UNIVERSAL FAMILY INSURANCE,
17 LLC, a Massachusetts limited liability
company, and JESSE MONTANO, an
individual and DOES 1-5,

18 Defendants.
19
20
21
22
23
24
25
26
27
28

CASE NO. SACV11-01017-JVS (ANx)

[Assigned to the Honorable James V. Selna]

[DISCOVERY MOTION before
Hon. Arthur Nakazato, Magistrate Judge]

**DECLARATION OF BENJAMIN
TAYLOR IN SUPPORT OF MOTION
FOR ISSUANCE OF A REQUEST FOR
JUDICIAL ASSISTANCE (LETTER OF
REQUEST) UNDER THE HAGUE
CONVENTION ON THE TAKING OF
EVIDENCE ABROAD IN CIVIL OR
COMMERCIAL MATTERS**

[Notice of Motion and Motion, Proposed
Letter of Request filed concurrently]

Date: April 19, 2012
Time: 10:00 a.m.
Courtroom: 6B

Action filed: July 8, 2011
Trial date: August 21, 2012

1 **DECLARATION OF BENJAMIN TAYLOR**

2 I, Benjamin Taylor, declare:

3 1. I am an attorney at law, duly licensed to practice before all courts of the State of
4 California. I am associated with the law firm Miller Baroness, LLP, counsel of record in
5 this matter for Defendant and Plaintiff in Counterclaim Universal Family Insurance, LLC
6 ("Universal"). I have personal knowledge of the facts contained in this declaration and, if
7 called as a witness, I could and would competently testify to those facts.

8 2. I submit this declaration and memorandum in support of Universal's Motion for
9 Issuance of Request for Judicial Assistance (Letter of Request).

10 3. The Motion follows the Local Rule 7-3 conference of counsel, which took place
11 on March 2, 2012.

12 4. Attached hereto as Exhibit A is a true and correct copy of the Evidence
13 (Proceedings in Other Jurisdictions) Act 1975.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct. Executed on March 12, 2012 at Los Angeles, California.

16 
17 BENJAMIN TAYLOR